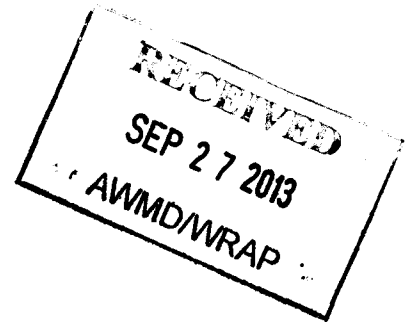




**Environmental
Operations, Inc.**
CLEARING THE WAY

September 26, 2013

Mr. Bruce Morrison
Project Manager
U.S. Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, KS 66219



RE: EPA & MDNR Comments on the June 28, 2013 Baseline Groundwater Monitoring Semi-Annual Report for the Solutia – John F. Queeny Site, St. Louis, Missouri
EPA ID No. MOD 004 954 111

Dear Mr. Morrison:

Environmental Operations, Inc. (EOI), on behalf of SWH Investments, is responding to the U.S. Environmental Protection Agency Region 7 (EPA) and the Missouri Department of Natural Resources (MDNR) comment letter dated August 30, 2013, for the referenced subject. Below are the verbatim comments (in italics) and our reply.

1. *Appendix B should be revised to provide the analytical data to support the February 11, 2013 results provided in Table 2. For instance, analytical data to support the entries in Table 2 for Monitoring Well MW-28A was not provided in Appendix A or B.*

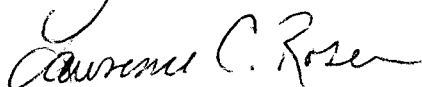
Per the EPA-approved sampling schedule, MW-28A was not sampled during the February 2013 event. Consequently, no data would appear in the table or laboratory reports in the appendices. On this basis, no revisions are needed.

2. *The results for benzene and chlorobenzene in Table 2 for the Monitoring Well MW-28B sample collected on February 11, 2013 should be shaded because they exceed their respective MCL values.*

We concur. Please find attached the revised page with benzene and chlorobenzene highlighted, to replace the page you have.

If there are questions or concerns, please contact me by phone at (314) 241-0900, or via email at larryr@environmentalops.com.

Respectfully submitted,
ENVIRONMENTAL OPERATIONS, INC.


Lawrence C. Rosen, R.G.
Senior Project Manager

Copy: Ms. Christine Kump-Mitchell/MDNR
Mr. Rich Nussbaum/ MDNR
Mr. Mike House, Solutia

RCRA



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